

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 20-CR-20233-1

v.

HON. BERNARD A. FRIEDMAN

JOHN RANKIN III,

Defendant.

EMERGENCY MOTION FOR PERMISSION TO TRAVEL

NOW COMES Defendant John Rankin III through his attorneys Smith Mihas PLLC in support of his Emergency Motion for Permission to Travel, as follows:

1. John Rankin is one of 21 defendants charged in June 2020 as part of an alleged conspiracy to deliver prescription drugs, in violation of 21 U.S.C. §§ 841(a)(1) and 846. See ECF 1, 229.
2. On June 11, 2020, the Court granted Mr. Rankin an unsecured bond. See ECF 30.
3. Mr. Rankin's pretrial release has been uneventful, with no complaints filed by his pretrial services officer.

4. On October 5, 2021, Mr. Rankin asked pretrial services for permission to travel to Puerto Rico for his son's 30th birthday party.
5. Mr. Rankin believed that since Puerto Rico is a United States commonwealth, it was not considered international travel; but rather, it was considered travel within the United States.
6. Pretrial services officer, L'Shawnda Roby, advised Mr. Rankin to forward her his flight itinerary and to immediately file this motion with the Court.
7. With the Court's permission, travel will occur from October 7, 2021 to October 11, 2021, as indicated in the itinerary that Mr. Rankin forwarded to his pretrial services officer.
8. Travel will occur within the United States and Puerto Rico, a United States commonwealth.
9. Pretrial services is in possession of Mr. Rankin's passport and, as indicated by his compliance with the terms of his bond, poses no risk of flight or threat to the community.

WHEREFORE, John Rankin respectfully requests this Honorable Court permission to travel from Detroit to Puerto Rico, leaving Detroit on

October 7, 2021 and returning to Detroit from Puerto Rico on October 11, 2021.

Respectfully Submitted,

SMITH MIHAS PLLC

/s/ Haralambos D. Mihas
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Attorney for John Rankin, III

CERTIFICATE OF SERVICE

I certify under penalty of perjury that I filed and served the aforementioned Emergency Motion for Permission to Travel with the Court and the United States Attorney's Office through the Court's CM/ECF electronic filing and service system on October 5, 2021. Further, Pretrial Services Office L'Shwanda Roby was served a copy of the aforementioned motion through electronic mail on October 5, 2021.

/s/ Haralambos D. Mihas
Haralambos D. Mihas, P66417
Attorney for John Rankin, III

